

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff,

v.

(1) JUAN R. PEDRO VIDAL,
(2) LUIS OMEL PEDRO,
(3) JUAN L. PEDRO VIDAL,
(4) JOSE E. CRUZ-PINERO,
(5) RAFAEL E. MARCANO-RODRIGUEZ,
(6) JOSE RENE RIOS-FUENTE,
Defendants

CRIMINAL NO. 16-778(GAG)

JOINT MOTION IN COMPLIANCE REGARDING DISCOVERY

TO THE HONORABLE
GUSTAVO GELPI
UNITED STATES DISTRICT JUDGE
FOR THE DISTRICT OF PUERTO RICO

COMES NOW, the defendants, JUAN R. PEDRO VIDAL, LUIS OMEL PEDRO, JUAN L. PEDRO VIDAL, JOSE E. CRUZ-PINERO, RAFAEL E. MARCANO-RODRIGUEZ, and JOSE RENE RIOS-FUENTE, through the undersigned counsel and respectfully state the following regarding discovery in the above-captioned matter:

1. During a Status Conference held on March 22, 2017, counsel for the defendants represented at the hearing requested that the government compile a Master List of Bates-stamped discovery, in order to be able to adequately and appropriately

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identify the items provided, as well as to facilitate the creation of a permanent record of all discovery produced during this litigation.

2. Furthermore, counsel requested that, with the exception of each defendant's prior record and any statements provided by individual defendants, the rest of the discovery produced pursuant to Fed. R. Crim. P. 16 along with other applicable laws and statutes, should be provided to all defendants.

3. Defense counsel consented to this method of disclosure in open court, but the Court has requested all counsel consent in writing as well. This Motion in Compliance serves as that consent: subscribing counsel agree that, with the exception of each defendant's prior record and any statements provided by individual defendants, any items disclosed during discovery should be disclosed to all defendants.

WHEREFORE, it is respectfully requested that this Court take notice of the consent of all counsel to the procedure described above.

IT IS CERTIFIED that a copy of this motion has been electronically filed and served upon all attorneys of record.

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RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, March 24, 2017.

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